

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING SEALING  
DEADLINES IN CONNECTION WITH  
(1) INDIVIDUAL PLAINTIFFS' SECOND  
AMENDED MASTER COMPLAINT  
(DKT. 494) AND (2) LOCAL  
GOVERNMENT AND SCHOOL  
DISTRICT PLAINTIFFS' MASTER  
COMPLAINT (DKT. 504)**

**STIPULATION**

The Individual, Local Government, and School District Plaintiffs and Defendants submit this Joint Stipulation and Proposed Order modifying Defendants' deadlines to move to seal redacted material in (1) the Individual Plaintiffs' Second Amended Master Complaint (Dkt. No. 494) and (2) the Local Government and School District Plaintiffs' Master Complaint (Dkt. No. 504).

WHEREAS, on December 15, 2023, the Individual Plaintiffs filed their Second Amended Master Complaint (Dkt. No. 494), which withdrew certain Counts and incorporated by reference selected paragraphs from complaints filed (1) by the Attorney General of New Mexico against the Meta Defendants and (2) by the Attorney General of Utah against the TikTok Defendants, portions of which were in turn filed under seal in their respective originating jurisdictions.

WHEREAS, on December 18, 2023, the Local Government and School District Plaintiffs filed their Master Complaint (Dkt. No. 504).

WHEREAS, Defendants agree with Plaintiffs' proposed provisional sealing of material in the two Master Complaints;

WHEREAS, under the Order Setting Sealing Procedures (Dkt. No. 341), the deadline for Defendants to file an omnibus sealing stipulation and/or motion addressing the redacted material in the complaints filed by the Attorney General of New Mexico against the Meta Defendants and by the Attorney General of Utah against the TikTok Defendants, attached as Exhibits B and C to the Individual Plaintiffs' Second Amended Master Complaint (Dkt. No. 494), is December 29, 2023; and the deadline for Defendants to file an omnibus sealing stipulation and/or motion addressing the redacted material in the Local Government and School District Plaintiffs' Master Complaint is January 2, 2023.

WHEREAS, the New Mexico complaint includes a cumulative 75 pages of redactions, and the Utah complaint includes a cumulative 15 pages of redactions.

WHEREASE, in light of the amount of provisionally sealed material and the intervening holidays—during which numerous Meta and TikTok personnel whose input is necessary to determining the need to keep particular content sealed are unavailable—Defendants requested, and the Individual, Local Government, and School District Plaintiffs granted, Defendants an extension of the above sealing deadlines to January 12, 2024.

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO COURT  
2 APPROVAL, THAT: Defendants' deadline to file omnibus sealing stipulations and/or motions in  
3 connection with the Individual Plaintiffs' Second Amended Master Complaint (Dkt. No. 494) and the  
4 Local Government and School District Plaintiffs' Master Complaint (Dkt. No. 504) is extended to January  
5 12, 2024.

6  
7  
8 DATED: December 20, 2023

Respectfully submitted,

9 /s/ Lexi J. Hazam

10 LEXI J. HAZAM

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**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Yvonne Gonzalez Rogers  
United States District Judge



**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 20, 2023

By: /s/ Ashley M. Simonsen  
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